

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

LEO BRENT BOZELL,

Defendant

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Case No. 21-cr-00216-JDB

DEFENDANT LEO BOZELL’S UNOPPOSED MOTION TO CONTINUE TRIAL

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Attorney for Defendant

NOW comes Defendant Leo Bozell by and through his counsel of record, William L. Shipley, Jr., and respectfully files this motion to continue trial currently set to begin May 15, 2023. Counsel for the parties have discussed the need for this motion, and the Government does not oppose a continuance.

On April 17, 2023, counsel for the Government informed the undersigned counsel that the Government will be seeking a Superseding Indictment the last week of April, and that Superseding Indictment will add two additional felony offenses. One will be a violation of 18 U.S.C. 111(a) – an offense not among the charges in the current indictment.

Pursuant to 18 U.S.C. Sec. 3161(c)(2), trial cannot commence less than 30 days following the return of a superseding indictment if new counts are added as a defendant will have not had notice and an opportunity to prepare to defend on the new counts.

Undersigned has conferred with Government Counsel who agrees the need to continue the trial due based on the superseding indictment which is expected to be obtained prior to July 15, 2023.

Counsel for both Mr. Bozell and the Government request a status conference as early as possible date in order to confirm a new trial date with the Court.

Dated: April 19, 2023

Respectfully submitted,

/s/ William L. Shipley
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